

LAW OFFICES OF LES ZIEVE  
LES ZIEVE, ESQ., Ca. Bar #123319  
MICHAEL LE, ESQ., Ca. Bar #255056  
18377 Beach Blvd., Suite 210  
Huntington Beach, CA 92648  
(714)848-7920

Counsel for Movant

UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF CALIFORNIA

In re  
Paul and Rosa Moller,  
Debtor.

US Bank National Association N.D., its assignees  
and/or successors in interest,

Movant,  
vs.  
Paul and Rosa Moller,  
Office of the U.S. Trustee, Trustee

Respondent.

Case No. 09-29936

Motion No. LAZ #1

Chapter 11

**NOTICE OF MOTION FOR RELIEF  
FROM THE AUTOMATIC STAY**

**Local Rule 4001-1 and Local Rule 9014-1**

Date: November 17, 2009

Time: 9:30 a.m.

Place: Ctrm 35

501 I Street, Sixth Floor

Sacramento, California

**TO ALL INTERESTED PARTIES:**

**PLEASE TAKE NOTICE** that on November 17, 2009 at 9:30 a.m. at the above captioned Court, before the HONORABLE CHRISTOPHER M. KLEIN, located at 501 I Street, Sixth Floor, Sacramento, California, US Bank National Association N.D., its assignees and/or successors in interest, move the Court for an Order terminating the Automatic Stay as to the enforcement of its state law remedies against the real property described in the supporting documents filed and served herewith.

The Motion is filed pursuant to Local Bankruptcy Rule 4001-1 and Local Bankruptcy Rule 9014-1 of the Local Bankruptcy Rules of Practice for the United States Bankruptcy Court,

1           The Motion is filed pursuant to Local Bankruptcy Rule 4001-1 and Local Bankruptcy  
2 Rule 9014-1 of the Local Bankruptcy Rules of Practice for the United States Bankruptcy Court,  
3 Eastern District of California.  
4

5           The Motion will rest on this Notice of Hearing, and other supporting papers filed and  
6 served concurrently herewith, the argument which may be presented at the hearing and upon such  
7 other oral and or documentary evidence as the Court may admit or judicially notice at the hearing.

8           The Local Bankruptcy Rules require that any Opposition to the Motion must be filed  
9 and served, in writing, not less than fourteen (14) calendar days preceding the hearing date and must  
10 be supported by admissible evidence.

11           Unless written Opposition supported by admissible evidence is filed and served as  
12 required by the Local Bankruptcy Rules, the Court may resolve the matter without oral argument.  
13

14 DATED: October 30, 2009

**LAW OFFICES OF LES ZIEVE**

15  
16  
17 /s/ Les Zieve

18 \_\_\_\_\_  
19 By: LES ZIEVE  
20 Counsel for Movant  
21  
22  
23  
24  
25  
26  
27  
28